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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

WNI 16-017621 Shapiro & DeNardo, LLC 14000 Commerce Parkway, Suite B Mount Laurel, NJ 08054 (856) 793-3080 Charles G. Wohlrab, Esq. 016592012

ATTORNEYS FOR WELLS FARGO BANK, N.A.

IN RE:

TARA L. LYONS A/K/A TARA L. SHEEHAN, DEBTOR Order Filed on July 29, 2019 by Clerk U.S. Bankruptcy Court District of New Jersey

CASE NO.: 19-17259-JKS

HEARING DATE: JULY 25, 2019

JUDGE: HONORABLE JOHN K.

SHERWOOD

## CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

The relief set forth on the following pages, numbered two (2) through two (2) is hereby ORDERED.

**DATED: July 29, 2019** 

Honorable John K. Sherwood United States Bankruptcy Court This matter being opened to the Court by Todd S. Cushner, attorney for the Debtor upon filing of a Chapter 13 Plan, and Wells Fargo Bank, N.A., hereinafter "Secured Creditor," by and through its Authorized Agent, Shapiro & DeNardo, LLC, upon the filing of an Objection to Confirmation of Plan, and parties having subsequently resolving their differences with regard to the Debtor's Chapter 13 Plan; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and the court considered the parties' application for entry of this Consent Order, and for other good cause shown,

- Debtor will apply through Secured Creditor's Servicing agent for a loan modification to cure prepetition arrearages on the mortgage loan secured by 34 Pershing Avenue, Ridgewood, NJ 07450.
- 2. This loan modification review shall be completed by September 23, 2019, or further ordered by the Court.
- 3. Starting May 1, 2019Debtor agrees to maintain contractually monthly post-petition payments to Creditor in the amount to \$3,367.31.
- 4. If a loan modification is not offered by the date specified in Paragraph Two (2), Debtor must within fourteen (14) days of receipt of the denial; 1) modify the Chapter 13 Plan to fully cure Secured Creditor's prepetition arrearages of \$93,953.83 as filed in Proof of Claim No.2-1, 2) modify the Chapter 13 Plan to surrender the subject property, or 3) Convert to a Chapter 7 case.
- 5. Creditor agrees this Order resolves the Objection to Confirmation of Chapter 13 Plan, filed on June 26, 2019; ECF Doc. No.: 30.
- This Consent Order is hereby incorporated into Debtor's Chapter 13 Plan.

We hereby consent to the form, content, and entry of the within Order.

Shapiro & DeNardo, LLC

Charles G. Wohlrab, Esquire Attorney for the Secured Creditor

Todd S. Casheer, Esquire Attorney for the Debtor 7/23/19

Date: